EX PARTE OR LATE FILED

Sprint

1850 M Street NW, 11th Floor Washington, DC 20036

April 26, 1999

Magalie Salas Secretary Federal Communications Commission TW-A325 445 12th St., SW Washington, D.C. 20554

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APR 26 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re:

EX PARTE PRESENTATION

CC Docket No. 92-105

Dear Ms. Salas:

On April 22, 1999, Paula Holbrook, Paul Ludwick and I met with Kurt Schroeder, Debra Sabourin, Helene Nankin, and Marilyn Jones of the Network Services Division, Common Carrier Bureau, to discuss implementation of the 711 code for Telecommunications Relay Services. Sprint reviewed the attached material in the course of this meeting.

An original and one copy of this letter are being filed.

Sincerely,

Norina Moy

Director, Federal Regulatory Policy and Coordination

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cc:

K. Schroeder

D. Sabourin

M. Jones

H. Nankin

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Let A D O D E

Rating/Billing Issues For TRS Calls Initiated From Wireless Phones

Paul Ludwick / Paula Holbrook 22 April 1999

Problem

- Wireless call placed by customer to TRS
- Caller requests a toll call type (long distance)
- Relay operator requests alternate billing option or indicates LD calls may not be placed through TRS
- Customer is upset about alternate billing requirement and/or toll charge

Scenario Specifics

- Call originated by wireless user.
- Call presented to relay via Feature Group D (FGD)
- ANI (Charge Party Number) contained in FGD information is that of the wireless provider access line, not the Calling Party Number of the user
- Call is identified as a wireless call through the Information Digit pairs, 61, 62, and 63. Some identified as 07.

Scenario Specifics (cont.)

- Information digits prevent "Sent Paid" or Direct Billed toll calls.
- Relay rates the call (toll/local) based on the NPA/NXX of the calling and called parties
- Relay does not have visibility to the extended local calling plans of wireless providers (state or nationwide calling)

Scenario Specifics (cont.)

■ Since relay does not have the extended calling plan information AND since the wireless providers indicate that the phone "line" may not direct bill calls, the relay provider informs the customer that the call is toll and asks for an alternate billing method.

Solutions?

- Wireless providers grant access to calling plans.
 - Requires major investment in infrastructure
 - Plans vary by phone number.
 - Large number of service providers
- Relay provider asks subscribers if they have an extended calling plan and process calls accordingly.
- Relay provider places all wireless calls as local/non-toll calls.

Sprint Relay



Discussion

Paula Holbrook and Paul Ludwick



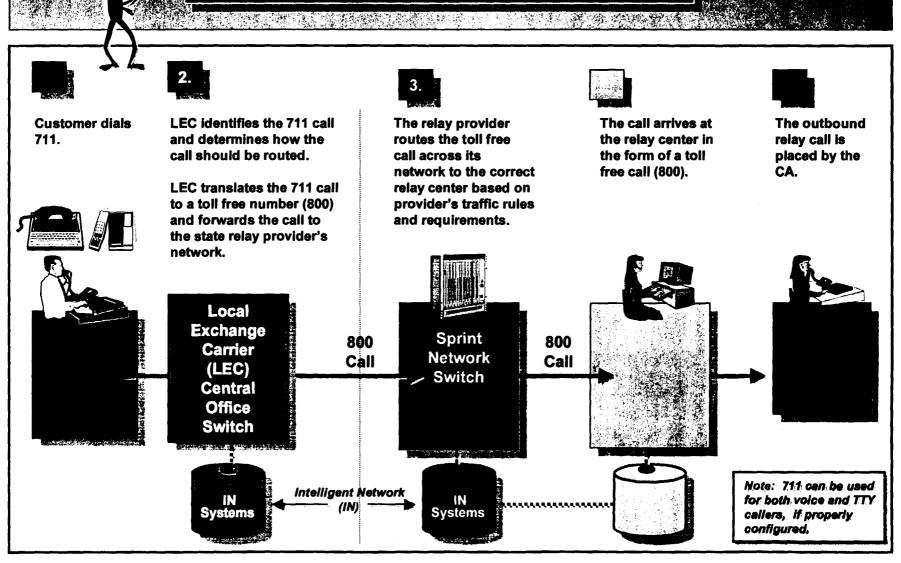






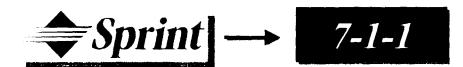
- I. How It Works
- II. Relay Provider Role
- III. Implementation Process
- IV. Generic Benefits
- V. Benefit With Largest Impact
- VI. Impact On TTY Users
- VI. Issues & Potential Problems

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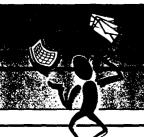








- O Sprint's role is limited to that of the relay provider and consultant to state.
 - **■Implement 711 within the Sprint network and relay platform**
 - **■**Participate in the 711 implementation process.
 - **■Offer consultation services to the state**
 - **■**Provide understanding of the relay platform
 - **■Relay call processing SME**
 - **Provide CA training to accommodate 711 service**
 - **■**Provide outreach, if contracted



III. Implementation Process

- O Implementation of 711 is the responsibility of the state and the Local Exchange Companies and Wireless Service providers operating within the state.
- O The following steps occur in the process of implementing 711 for each state. In some cases the sequence of the steps may vary.



State or Industry leaders determine the need for 711.

Issue: Multiple Vendor Environment 2. —

State or Industry leaders approach the LECs and wireless providers that operate within the state.

3. -

State/Industry leaders work directly with the companies or through the telephone co. association to gain consensus for 711.

Regulatory action may be required.



State Officials enlist the support of Sprint Relay.

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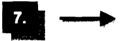
State/Industry leaders coordinate meeting between local and wireless co. and the relay provider to discuss the approach and tentative timeline.

Continue



If state customer selects option to purchase a new toll free number to support 711, Sprint implements toll free number and orders N00 reports. State Customer invited to test toll free number.

Issues: Targeted Users Foreign Language Use



State works with telephone companies to monitor implementation progress & ensure understanding by project participants.



Sprint Relay participates in progress/project meetings on a limited basis.



State, Sprint Relay, and Telephone Companies develop outreach plan.

Outreach plan implemented.



Implementation complete.

Integrated testing performed by Sprint and State Customer.



711 available to Relay Users.

ASA
Requirements
relaxed.
Outreach tied
to ASA
relaxation



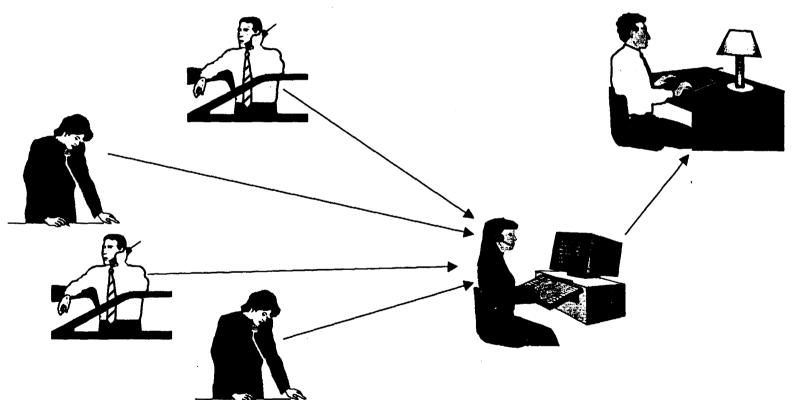




- © Easy to remember number
- ODifficult to misprint or misunderstand
- OConsistent across the country
- OConsistent across relay providers

V. Benefit With Largest Impact

Opens relay to voice users that are not amiliar with the service or toll free number





- **△ O**More accessible to voice users
 - **O**Travel communication made easier
 - **■Same access number**
 - **■No re-programming of TTY**
 - OIncreased confidence in relay system
 - **O**Shortened dial times

VIII. Issues & Potential Problems

- **O**Multiple Vendor Environment
- **OWrong Number Call Volume Increase**
 - **Relaxation of ASA and Service Level**
- O Specialized Services (Spanish, S2S)
- **O**Targeted Users (Branding)
- **O**Outreach